

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

TIMOTHY L. BILLIG and  
TERESA M. BILLIG,

Debtors

:  
:  
: CHAPTER 12  
:  
:  
: BKRTCY. NO. 20-12771 pmm

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Kevin K. Kercher, Esquire, has file a Motion to Withdraw as Counsel to Debtors in this case. Counsel's relationship with Mr. Billig, in particular, has deteriorated to the point of accusations by Mr. Billig that counsel doesn't know what he's doing, that he's 'working for the bank', and said recently among several people including realtors and potential buyers for their property that counsel could 'go F\*ck himself' and that this message should be relayed to counsel. Obviously, counsel cannot continue under these circumstances. It is not believed that Debtor Mrs. Billig has any objection to the withdrawal.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, If you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **November 18, 2022** you or your attorney must do all of the following:

- (a) file an answer explaining your position at

**Clerk, U.S. Bankruptcy Court  
The Gateway Bldg.  
201 Penn St., Ste. 103  
Reading, PA 19601**

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the movant's attorney:

**LAW OFFICES OF KEVIN K. KERCHER, ESQUIRE, P.C.  
Kevin K. Kercher, Esquire  
881 Third Street, Suite #C-2  
Whitehall, PA 18052  
(610) 264-4120 phone  
(610) 264-2990 fax**

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on **December 1, 2022, at 11:00 a.m.** in Fourth Floor Courtroom, United States Bankruptcy Court, The Gateway Building, 201 Penn Street, Reading, PA 19601.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (610) 208-5040 to find out whether the hearing has been canceled because no one filed an answer.

Date: 11/4/2022

Attorney for Movants

/s/ Kevin K. Kercher  
**Kevin K. Kercher, Esquire  
881 Third Street, Suite #C-2  
Whitehall, PA 18052  
(610) 264-4120 phone  
(610) 264-2990 fax**